

# **EXHIBIT 17**

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1                   UNITED STATES DISTRICT COURT  
2                   FOR THE  
3                   SOUTHERN DISTRICT OF NEW YORK  
4                   CIVIL ACTION NO. 20 Civ. 7311 (LAK) (JLC)

4                   \*\*\* CONFIDENTIAL \*\*\*

5                   VIDEOTAPED  
6                   E. JEAN CARROLL,                   DEPOSITION UPON  
7                   Plaintiff,                           ORAL EXAMINATION  
8                   v.                                   OF  
9                   DONALD J. TRUMP, in his  
10                   personal capacity,  
11                   Defendant.

12                   -----  
13  
14                   TRANSCRIPT of the stenographic notes of  
15                   ANDREA F. NOCKS, a Certified Court Reporter and  
16                   Certified Realtime Court Reporter, Certificate No.  
17                   XI01573, taken virtually on Thursday, October 6,  
18                   2022, commencing at 11:52 a.m., Central Standard  
19                   Time.

20  
21  
22  
23  
24                   Job No. P1-5497396  
25

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1 please let me know. I'm used to it, you won't  
2 offend me.

3 And if, for any reason, you don't  
4 understand one of my questions, also just ask me and  
5 I'll try to clarify. It's important that the court  
6 reporter which is on Zoom has the ability to take  
7 down my questions and your answers, and every  
8 question and answer has to be in words, no nodding  
9 your head or something like that. If you can  
10 remember.

11 A. Um-hum.

12 Q. And I'll just key off the question,  
13 or you probably heard the colloquy between me and  
14 Ms. Habba about your mental state.

15 Is there anything that you, any kind  
16 of medication or anything else that you are on right  
17 now that would in any way impair your ability to  
18 testify?

19 A. I am on Tramadol right now.

20 Q. What is Tramadol?

21 A. It's a pain medication.

22 Q. Why are you taking that?

23 A. Because my foot is broken.

24 Q. And when did you break your foot?

25 A. Three weeks ago-ish.

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1 Q. Have you experienced any  
2 hallucinations on Tramadol?

3 A. No.

4 Q. Have you had any blackouts on  
5 Tramadol?

6 A. No.

7 Q. Have you experienced any other  
8 symptoms -- how many days have you been on Tramadol?

9 A. As needed, since I broke my foot.

10 Q. And during that time, have you had  
11 any other symptoms from Tramadol that would affect  
12 your cognition, your ability to think, hear and  
13 answer questions?

14 A. No, I took a very low dose --

15 Q. Thank you.

16 A. -- for this purpose.

17 Q. The other thing I want to tell you  
18 especially --

19 (Court Reporter clarification.)

20 BY MS. KAPLAN:

21 Q. The other thing I want to tell you,  
22 Ms. Grisham, is that to the extent you need a break,  
23 I hope not, but if you're in pain or need a break,  
24 just let us know and we'll accommodate you.

25 A. Thank you.

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1 Ms. Kaplan, not you, Ms. Grisham is under the  
2 influence of drugs, narcotics. She just admitted  
3 that on the record.

4 I understood from her attorney, Adam,  
5 that she was not going to be deposed while she was  
6 under the influence of any narcotics. That was a  
7 letter that she sent not only to me but on other  
8 cases, and I understood that she would not be on  
9 medication.

10 MR. VanHo: No, my understanding is,  
11 is that she's on medication, she's disclosed the  
12 medication. She took a lower dose this morning for  
13 it. And at the time we sent the letter with regards  
14 to the other cases, it also had a travel  
15 restriction. Depositions were supposed to be in  
16 Cleveland, not in Kansas. And the problem with  
17 travel had to do with the plane flight and all that  
18 information.

19 There was an attempt to reschedule it  
20 for Kansas; however, it was on such short notice, we  
21 were not able to do so and fit in everybody's trial  
22 calendar. So it was a combination of factors that  
23 went into it.

24 My understanding is she goes back on  
25 the 29th for reevaluation and, but for right now

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1       she's taking a low dose and I've talked to her this  
2       morning, I haven't had any problems communicating  
3       with her. She's answered all my questions. She  
4       does not appear to be under the influence of  
5       anything that would impact her.

6                   MS. HABBA: All due respect to you,  
7       you did state that part of the problem on another  
8       case was the fact that she was on pain medication so  
9       you did not want her to testify. That was on an  
10       unrelated case. Isn't that correct?

11                  MR. VanHo: It was a combination, it  
12       was a combination of factors.

13                  MS. HABBA: Right.

14                  MR. VanHo: And then she was on a  
15       higher level at that point, too.

16                  MS. HABBA: All due respect, we are  
17       not physicians, but I would prefer to postpone this  
18       deposition until Ms. Grisham is not on medication  
19       that impairs. Drugs and narcotics are going to.  
20       We're not physicians. It's not your place or mine,  
21       frankly, or Ms. Kaplan's. I'm speaking to --

22                  MS. KAPLAN: You want me to call  
23       Judge Kaplan, Ms. Habba? This is my deposition.  
24       I --

25                  MS. HABBA: I actually think we

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1 have occasion in that job to meet with Mr. Trump  
2 one-on-one.

3 Did you also participate in meetings  
4 with other members of the administration?

5 A. Yes.

6 MR. SWIFT: Objection to form.

7 MS. KAPLAN: And what's the objection  
8 there, sir?

9 MR. SWIFT: I'm objecting as I did  
10 previously due to her mental capacity based upon  
11 Ms. Habba's prior statement.

12 MS. KAPLAN: Okay. That's an  
13 objection that's noted for the record. That's not  
14 an objection to form. An objection to form has to  
15 do with how I ask the question.

16 MR. SWIFT: Understood. But you said  
17 before, said now it has to be form and then -- or  
18 privilege, so I am objecting based upon mental  
19 capacity, and I could just keep that objection  
20 throughout the proceeding 'cause I'm going to object  
21 to every question until Judge Kaplan gets on the  
22 line.

23 MS. KAPLAN: Okay. Can I have the  
24 last Q and A read back?

25 (The following Question and Answer

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1 Q. And were you entitled to any other  
2 compensation in connection with the book?

3 A. I believe there's some kind of  
4 royalties that happen after a certain period of  
5 time, but I honestly don't know the ins and outs of  
6 it.

7 Q. Have you received any?

8 A. No, I haven't received any.

9 Q. Okay. Have you received any money  
10 other than the advance since the book has been  
11 published from the publisher?

12 A. No, no.

13 Q. Okay. And have you ever been  
14 arrested before?

15 A. Yes, twice.

16 Q. Okay. What was the first time?

17 A. Reckless driving.

18 Q. And what was the approximate time  
19 period?

20 A. Oh, gosh. It was probably -- it's in  
21 my book. I wrote about it extensively in my book.  
22 Like eight, nine years ago. It's a guess.

23 Q. Okay. That's okay if you're  
24 estimating. That's fine.

25 And was there any sort of conviction

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1 in connection with that arrest?

2 A. We settled for -- we settled and we  
3 settled for reckless driving, so yes, I guess.

4 Q. Okay. And what were the  
5 circumstances that led to the reckless driving?

6 A. I had had -- I was driving home from  
7 a movie, I had had two glasses of wine. The speed  
8 limit was 45 and then it went to 35 very quickly and  
9 I didn't know, so I got pulled over 'cause I was  
10 still going 45 in a 35.

11 The policeman asked me if I had been  
12 drinking, I said yes and he gave me a breathalyzer,  
13 and it's a no tolerance state in Arizona and I was  
14 arrested.

15 Q. And what was your blood alcohol  
16 content?

17 A. .08. The very minimum.

18 Q. And then what about the second time  
19 when you were arrested?

20 A. The second time was a DUI and that  
21 was in 2014 or 2015.

22 Q. Okay. And where was it that that  
23 arrest occurred?

24 A. Scottsdale, Arizona.

25 Q. And were you breathalyzed in

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1 connection with the arrest?

2 A. Yes.

3 Q. And what was your blood alcohol?

4 A. .08.

5 Q. And were you ultimately convicted of  
6 a crime in connection with the arrest?

7 A. Yes, DUI.

8 Q. And have you, have you ever, have you  
9 ever had any substance abuse problems?

10 A. No.

11 Q. Have you ever treated for any  
12 substance abuse problems?

13 A. No. Well, I had to take  
14 court-ordered AA and a class that was court ordered,  
15 so yes.

16 Q. Okay. And was that in connection  
17 with the DUI?

18 A. Correct, the second one, yes.

19 Q. And have you ever sued anybody  
20 before?

21 A. No.

22 Q. Have you ever been sued before?

23 A. No.

24 Q. Have you ever -- you've never been a  
25 party to a lawsuit before?